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February 19, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, DC 20554

Attn: Dennis Johnson, Competition Policy Division
Wireline Competition Bureau

Re: Section 214 Application for Transfer of Control Authority
Piedmont Communications Services, Inc.

Dear Ms. Dortch:

This letter is submitted as a supplement to the Section 214 application for Transfer of Control Authority involving Piedmont Communications Services, Inc. ("PCS"), as a provider of resold telecommunications services to domestic points on a non-dominant basis. As the application explained, control of PCS was transferred as the result of a merger of its parent company, Piedmont Telephone Membership Corporation ("PTMC"), into Surry Telephone Membership Corporation ("STMC") as of January 1, 2009.

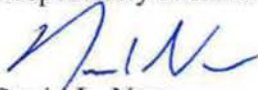
This letter provides additional information in response to an inquiry from Commission staff. The information was provided to the undersigned by management of STMC.

At the time of the merger, both PTMC and PCS provided telecommunications services only in Davidson County, North Carolina. PTMC was a local exchange carrier and its subsidiary, PCS, operated as a reseller of long distance services, both domestic and international. PTMC and PCS served the same area of Davidson County. They had no other affiliates that provided telecommunications services. Both PTMC and PCS were corporations organized under the laws of North Carolina.

STMC is a local exchange carrier that operates in Surry and Stokes Counties of North Carolina. As the result of the merger of PTMC into STMC, STMC now also provides local exchange service in Davidson County, North Carolina. STMC had a subsidiary named Surry Telecommunications, Inc. ("STI") that operated as a reseller of long distance services in Surry and Stokes Counties until STI was merged into PCS as of July 1, 2009. PCS now operates as a telecommunications reseller in Davidson, Surry and Stokes Counties in the same portions of those counties as are provided local exchange service by STMC. Both STMC and STI were organized in North Carolina as corporations. Other than PCS, STMC has no affiliates at this time that provide telecommunications services.

If any questions arise please communicate with this office.

Respectfully submitted,



David L. Nace